

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ESTATE OF ALEXANDER R. PIPER, III; and  
MARTHA PIPER, Individually,

Plaintiffs,

07-CV-9548 (Judge Swain)

-against-

EXPERT DISCLOSURE

METROPOLITAN TOWER LIFE INSURANCE  
COMPANY,

Defendant.

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Pursuant to Rule 26 of the Federal Rules of Civil Procedure and this Court's Scheduling Order, Defendant, METROPOLITAN TOWER LIFE INSURANCE COMPANY ("MetLife"), by and through its attorneys, hereby provides the following expert disclosure:

David W. Pitou  
Stockholder Consulting Services, Inc.  
135 Ocean Parkway, #14B  
Brooklyn, NY 11218  
Tel: (201) 446-2770

PLEASE TAKE FURTHER NOTICE THAT DAVID W. PITU may be expected to testify at the trial of this action. Testimony will support MetLife's defenses to Plaintiffs' allegations relating to the policyholder trust statements received by Mr. and Mrs. Piper. Mr. Pitou's testimony may also relate generally to the role of a transfer agent, such as Mellon Investor Services. The testimony will be based upon the expert's review of documents, professional experience (a summary of which is provided herewith as Exhibit A), and any evidence adduced at trial. MetLife will submit by separate cover the expert report of Dr. Pitou to Plaintiffs' counsel.

Dated: August 11, 2008  
Long Island City, New York

METROPOLITAN TOWER  
LIFE INSURANCE COMPANY

By:   
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